

AR201-13558

Jodi Burgess

01/22/02 03:46 PM

To: NCIC HPV@EPA

cc:

Subject: RE: AR201 HPV Challenge Program: Divestiture of CAS #15233-47-3

----- Forwarded by Jodi Burgess/DC/USEPA/US on 01/22/02 03:54 PM -----



Karen Hoffman

01/22/02 10:49 AM

To: NCIC OPPT/DC/USEPA/US@EPA, Jodi Burgess/DC/USEPA/US@EPA

cc: Karen Lannon/DC/USEPA/US@EPA, Sharon

Clark/DC/USEPA/US@EPA

Subject: RE: AR201 HPV Challenge Program: Divestiture of CAS #15233-47-3

----- Forwarded by Karen Hoffman/DC/USEPA/US on 01/22/02 10:48 AM -----



Barbara Leczynski

01/22/02 07:54 AM

To: Karen Lannon/DC/USEPA/US@EPA, Karen

Hoffman/DC/USEPA/US@EPA, Sharon Clark/DC/USEPA/US@EPA,

Jeffrey Taylor/DC/USEPA/US@EPA

cc:

Subject: HPV Challenge Program: Divestiture of CAS #15233-47-3

Barbara Leczynski
Chief, Existing Chemicals Branch

U.S. Environmental Protection Agency
EPA East, Room 4410-A, Mail Code 7405M
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Phone: 202-564-4770 Fax: 202-564-4775

----- Forwarded by Barbara Leczynski/DC/USEPA/US on 01/22/02 07:53 AM -----

02 JAN 22 PM 5:31
RECEIVED
OPPT NCIC



"Rataj, Mike"

<mlrataj@uop.com>

01/21/02 05:07 PM

To: Charles Auer/DC/USEPA/US@EPA, Barbara
Leczynski/DC/USEPA/US@EPA

cc: "Palmer, Robert" <rapalmer@uop.com>, "Nedeau, Nicholas"

<NJJNedeau@uop.com>, "Dement, James" <JRDement@uop.com>

Subject: HPV Challenge Program: Divestiture of CAS #15233-47-3

Dear Mr. Auer and Ms. Leczynski:

Attached please find our letter regarding divestiture of one of our HPV chemicals. We have also sent this letter via certified mail to Administrator Whitman and yourselves at the Virginia post office box.

As a result of this divestiture, we wish to have our company name removed from this chemical for HPV purposes. Thank you for your attention in this matter.

<<012102HPVEPALetter.doc>>

Michael Rataj

(847) 375-7570 phone

(847) 391-2953 fax

mlrataj@uop.com



012102HPVEPALette

uop

UOP LLC • 11111 Algonquin Road • Oak Plains, Illinois 60453-9011 • Tel: (847) 391-2000 • Fax: (847) 391-2001

January 21, 2002

Certified Mail and e-mail

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Re: HPV Challenge Program: Divestiture of CAS # 15233-47-3

Dear Governor Whitman:

UOP LLC agreed in earlier correspondence to participate in EPA's HPV Chemical Challenge Program. We volunteered to sponsor two chemicals, CAS No. 15233-47-3 and CAS No 5285-60-9. We would like to inform you of a change since our earlier submissions for CAS No. 15233-47-3.

As of October 25, 2001, UOP sold its refining chemicals business to Dorf Ketal Chemcials, LLC, a wholly owned subsidiary of Dorf Ketal Chemicals India Pvt. Ltd. Included in this sale was the chemical CAS No 15233-47-3.

UOP participated in the American Chemistry Council (ACC) *Rubber and Plastics Additives* (RAPA) panel, which included CAS No 15233-47-3. We continued to participate even after the divestiture was complete. ACC submitted the Substituted p - Phenylenediamines category test plan to EPA December 13, 2001, with UOP LLC listed as the producer of CAS No 15233-47-3. This test plan has been posted on the agency web site (<http://www.epa.gov/chemrtk/sbphnyld/c13383tc.htm>).

Therefore, as a result of the divestiture, **UOP requests to have its name removed from the HPV program for chemical CAS No. 15233-47-3.** We will also no longer participate in the ACC RAPA HPV panel, and have communicated this to ACC. We have also informed the acquiring company.

We will continue our HPV commitment for CAS No 5285-60-9 (Benzeneamine, 4,4'-methylenebis[N-(methylethyl)-], with a start date of 2002, as indicated in our July 24, 2001 letter to you.

We recognize that chemical sponsorship entails assembling/reviewing available test data, developing test plans, and, where needed, conducting additional testing per the Challenge Program. The information we provide under the HPV Challenge Program will be made publicly available.

Michael Rataj is the UOP LLC technical contact for the HPV program. I can be reached at (847) 375-7570 (phone), (847) 391-2953 (fax).

Sincerely,

Michael Rataj, CIH
HSE Skill Center Manager
Phone: (847) 375-7570, Fax: (847) 391-2953, E-mail: mlrataj@uop.com

Cc: AD Arneson; K J Aspray; JP Ausikaitus; CA Cabrera; JR Dement; D Kaminski; RV Scott; NJ Neddeau; RA Palmer; Charles Auer, EPA, 7405 M; Barbra Leczynski, EPA, 7405 M; Larry Rampy, ACC; Jim Keith, ACC; Anne Le Huray, ACC; Subodh Minon, Dorf Ketal Chemicals LLC; File: HPV